IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

COLUMBIA DIVISION

Mother Doe, individually and as the Mother and Natural Guardian for Jane Doe, a minor,	))))	C.A. No. 3:18-cv-02731-CMC
Plaintiff,	))	**DEFENDANT RICHLAND COUNTY SCHOOL DISTRICT TWO'S**
vs.	))	**SUPPLEMENTAL RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES**
Richland County School District 2, Sheriff of Richland County in his Official Capacity D/B/A Richland County Sheriff's Department, John E. Ewing, & Jamel Bradley,	))))))	
Defendants.	)	

Defendant Richland County School District Two ("Defendant School District"), by and through its undersigned counsel, hereby supplements its responses to the Court's Local Rule 26.01 Interrogatories as follows:

(A)   State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

None.

(B)   As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff has requested a jury trial.

(C)   State whether the party submitting these responses is a publicly owned company and separately identify:

(1)   each publicly owned company of which it is a parent, subsidiary, partner, or

affiliate;

(2)   each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and

(3)   each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

Defendant School District is not a publicly owned company.

(D)   State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER:

The claim is proper in this division because it includes federal claims based on conduct that allegedly occurred in Richland County, and based upon information and belief, most of the parties reside or are located in or near Richland County.

(E)   Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

(1)   a short caption and the full case number of the related action;

(2)   an explanation of how the matters are related; and

(3)   a statement of the status or the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

To Defendant School District's knowledge, this action is unrelated to any other pending matter filed in this District.

(F)   If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Defendant Richland County School District Two is properly identified.

(G)   If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER:

Upon information and belief, all potentially responsible parties have been named.

Respectfully submitted,

HALLIGAN   MAHONEY   WILLIAMS   SMITH
FAWLEY & REAGLE, PA

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December 6, 2018

Columbia, South Carolina